

# MEMO ENDORSED

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July 18, 2014

VIA ECF

The Honorable William H. Pauley III  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1920  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
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Re: *Moore Macro Fund, LP, et al. v. Lehman Brothers Holdings Inc., et al.*,  
Case No. 14-cv-05053 (WHP)

Dear Judge Pauley:

We represent defendants Lehman Brothers Holdings Inc., Lehman Brothers Special Financing Inc., and Lehman Brothers Commercial Corporation (collectively, “Lehman”) in the above-captioned proceeding. We write pursuant to Federal Rule of Civil Procedure 6(b) to request an extension of time for briefing to be filed in connection with the Motion to Withdraw the Bankruptcy Reference (Docket No. 1) (the “Motion”) submitted by plaintiffs Moore Macro Fund, LP, Moore Macro Markets Fund (Master), LP, SJL Moore, Ltd., JR Moore, LP, LM Moore LP, MF Moore LP (formerly Moore Global Fixed Income Fund (Master) LP), Moore Global Investments, LTD., Moore Emerging Markets Fund (Master) LP, Moore Capital Advisors, L.L.C., and Trade Process Corporation (collectively, “Moore”).

On May 30, 2014, Moore filed an adversary complaint against Lehman in the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”). Chapter 11 Case No. 08-13555 (SCC), Bankr. Ct. Case No. 14-02021 (SCC). On July 3, 2014, Lehman filed an Answer and Counterclaims in the Bankruptcy Court. Also on July 3, 2014, Moore filed the instant Motion to withdraw the reference from the Bankruptcy Court to the District Court. Lehman’s opposition to the Motion must be filed by July 21, 2014, pursuant to Local Civil Rule 6.1(b). Lehman and Moore have not made any previous requests for an extension.

Lehman and Moore have agreed to the following schedule for briefing in connection with the Motion:

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- The time for Lehman to oppose the Motion will be extended up to and including August 4, 2014.
- The time for Moore to reply will be extended up to and including August 18, 2014.

Lehman requests the Court to "so order" the foregoing schedule. We are available at the Court's convenience.

Respectfully,

/s/ Tracy V. Schaffer

Tracy V. Schaffer

cc: Counsel for Plaintiffs (by e-mail)

NYI-4600205v1

Application granted. This Court  
will hear oral argument on  
September 5, 2014 at 12:00 p.m.

**SO ORDERED:**

WILLIAM H. PAULEY III U.S.D.J.  
WILLIAM H. PAULEY III U.S.D.J. 7/21/14